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OCT 7 2009

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Clerk, U.S. District Court
Northern District of California

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

VINCE WAN,

Defendant.

No. CR 06-0426 SI

STIPULATION AND [PROPOSED]
ORDER CONTINUING TRIAL

STIPULATION

The parties, through undersigned counsel, STIPULATE that the trial in this matter be continued from October 19, 2009 to January 19, 2010 at 8:30 a.m. The reason for this continuance is that additional time is needed for trial preparation and defense counsel's unavailability due to his trial schedule. Therefore, the parties request that the trial in this case be continued to January 19, 2010 at 8:30 a.m., and that the pretrial conference be continued to January 12, 2010 at 3:30 p.m., with motions in limine and other trial filings to be filed in accordance with this Court's standard Order for Pretrial Preparation. Furthermore, the parties

STIPULATION; ORDER

1 agree that this case is legally and factually complex, and for that reason, as well as for effective
2 preparation and continuity of counsel, it is appropriate to exclude from the otherwise applicable
3 Speedy Trial Act computation the period from October 7, 2009 to January 19, 2010, because the
4 legal and factual complexity renders it unreasonable to expect adequate preparation for pretrial
5 proceedings and for trial within the otherwise applicable time limits set forth in the Speedy Trial
6 Act.

7
8 Dated: October 7, 2009

JOSEPH P. RUSSONIELLO
United States Attorney

9
10 /s/ Nicole M. Kim

11 _____
NICOLE M. KIM
Assistant United States Attorney

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13
14 Dated: October 7, 2009

/s/ Stuart Hanlon

15 _____
STUART HANLON
Attorney for Defendant Vince Wan

16
17 [PROPOSED] ORDER

18 Based upon the above Stipulation, and for good cause appearing, THE COURT ORDERS
19 THAT:

- 20 1. The trial in this matter is continued to January 19, 2010 at 8:30 a.m.
21 2. The pretrial conference in this matter is continued to January 12, 2010 at 3:30
22 p.m., with motions in limine and other trial filings to be filed in accordance with
23 this Court's standard Order for Pretrial Preparation.
24 3. The period from October 7, 2009 through January 19, 2010 is excluded from the
25 otherwise applicable Speedy Trial computation, pursuant to 18 U.S.C. §§
26 3161(h)(8)(A) and (B)(ii) and (iv).

27
28 Dated: 10/8, 2009



HON. SUSAN ILLSTON
United States District Judge